

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017.

Date filed: February 23, 2018

Name of company covered by this certification: Prairie Telephone Co., Inc.

Form 499 Filer ID: 811454

Name of signatory: Stephanie Thomsen

Title of signatory: Customer Service Manager

I, Stephanie Thomsen, certify that I am a CPNI Compliance officer of Prairie Telephone Co., Inc., herein referenced as the Company, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. See attached accompanying statement of operating procedures.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, the Company has not encountered known pretexting. The Company's protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed: Stephanie Thomsen  
Stephanie Thomsen, Customer Service Manager

**Attachment: Accompanying Statement of Operating Procedures**

Per the FCC CPNI rules [47 C.F.R. §64.2009(e)] and as referenced in the attached signed certification, Prairie Telephone Co., Inc., herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI file has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by the Company.
2. CPNI Compliance office has been designated to oversee all CPNI duties, training and activity
  - a. Established an outbound marketing supervisory review process for the use of CPNI
  - b. Records are maintained for any marketing campaigns that utilize customers' CPNI for minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
  - a. Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
  - a. All customers during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail)
  - b. Call detail is only released to customers during customer-initiated telephone contact by the following FCC approved methods for the release of the requested call detail: The Company does not use the password method.
    - i. Sending the requested detail to the address of record (only a physical or email address associated with that account that has been in the Company files for at least 30 days)
    - ii. Calling the customer back at the telephone number of record (only disclosing if the customer was authenticated as being an authorized account contact)
    - iii. Having customer come in to the Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
  - a. authorized user
  - b. address of record
  - c. customer response to a back-up means of authentication
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
  - a. Customers are notified annually of their rights for the use of their CPNI in marketing campaigns
  - b. New customers are notified of the opt-out procedure as a part of the customer sign-up process
  - c. Billing System displays customer's CPNI opting status
  - d. Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
  - a. Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
  - b. Company maintains security of all CPNI, including but not limited to:
    - i. Documents containing CPNI are shredded



**Prairie Telephone Co., Inc.  
d/b/a Western Iowa Networks**

**Policy and Procedures Governing  
Customer Proprietary Network Information**

## **Introduction**

### **Statement of Company Policy-**

Under applicable federal and state laws, Prairie Telephone Co., Inc. d/b/a Western Iowa Networks, (the “Company”) has a duty to protect the confidentiality and proprietary information of, and relating to, customers, other telecommunication carriers, and equipment manufacturers. To ensure full compliance with these laws and regulations, including, specifically, the rules of the Federal Communications Commission governing customer proprietary network information (“CPNI”), this Manual sets forth in detail the policy and procedures of Prairie Telephone Co., Inc., d/b/a Western Iowa Networks governing the use, disclosure, and provision of access to such proprietary information.

### **Statement of Company Policy**

\*\*\* Each employee of the Company is required to protect the confidentiality of Customer Proprietary Network Information (CPNI) and, shall comply with all policies and procedures set forth in this Manual.

\*\*\* Any violation of or departure from the policies and procedures set forth in this Manual shall be reported to the Company’s CPNI Compliance Officer.

\*\*\* Any failure to comply with the policies and procedures set forth in this Manual shall result in disciplinary action including, but not limited to, suspension and/or termination of employment.

**The policies and procedures set forth in this manual apply to all Employees,  
Officers, and Board Members of  
Prairie Telephone Co., Inc., d/b/a Western Iowa Networks.**

1. **Definition CPNI-** Customer Proprietary Network Information
  - A. Includes personally identifiable information derived from a customer's relationship with a wireline or wireless telephone company. Every telecommunications carrier has the duty to protect the confidentiality of its customers' CPNI.
  - B. Information contained in the billings pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI includes highly-sensitive personal information such as phone numbers called by a consumer; the frequency, duration, and timing of such calls, and any services purchased by the consumer, such as call waiting.
2. **Account Information-** Account information that is specifically connected to the customer's services relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
3. **Address of Record-** An address of record whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
4. **Call Detail Information-** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, and duration of any call.
5. **Telephone number of record-** The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information"
6. **Valid Photo ID-** A valid photo id is government- issued means of personal identification with photograph such as drivers license, passport, or comparable ID that is not expired.



### **Confidentiality of CPNI**

1. The company may only use, disclose, or permit access to individually identifiable CPNI-
  - a. as required by law
  - b. with the approval of the customer; or
  - c. in providing the telecommunication service from which the CPNI is derived or in providing services necessary to, or used in, providing such telecommunications service.
2. Disclosure upon Request by customers. The company shall disclose CPNI, upon affirmative written request by the customer, to any person designated by the customer.

### **Conduct Expressly prohibited by the Company**

1. The following are expressly prohibited by the Company:
  - a. Sale or possession of CPNI
  - b. Use of CPNI to track customers' use of competitors' services`
2. Any violation of this section shall be grounds for immediate termination of employment and, as applicable, referral to federal and/or state law enforcement authorities for further action. The Company may, however, in its discretion take alternative disciplinary action against any employee, officer, or board member of the Company found to have violated this section.

### **Permitted uses and Disclosures of CPNI**

1. The company may use CPNI obtained from its customers, either directly or indirectly through its agents.
  - a. To initiate, render, bill and collect for telecommunications services.
  - b. To provide marketing, in compliance with FCC guidelines
  - c. To protect the rights or property of the Company, or to protect users and other carriers from fraudulent or illegal use of or subscription to, such services.
  - d. For provision of information services
  - e. In its provision of maintenance and repair services



## **Company Policies and Procedures**

1. **Unauthorized Use of CPNI-** The Company regards any unauthorized or improper use, disclosure or access to CPNI as a serious offense, and will take appropriate disciplinary action, which may include suspension and/or termination of employment.
2. **Customer Request for CPNI-**
  - a. CPNI may be disclosed only to the customer or a third party designated by the customer to receive the customer's CPNI. The Company requires all employees to ensure that the person requesting CPNI is authorized to receive such CPNI. The Company requires authentication of a customer's identification prior to the release of CPNI on customer initiated telephone contacts or in-store visit.
  - b. The Company will disclose call detail on a customer initiated call only by sending the call detail to an address of record, calling the customer at the telephone or record, or if customer brings in a valid ID into one of our locations.
  - c. If the customer is able to provide call detail information to the Company's employee during a customer-initiated call without the Company employee's assistance then the employee is permitted to discuss the call detail information provided by the customer.
  - d. The Company will disclose non-call detail CPNI on a customer-initiated call if the customer provides identity authentication. Identity authentication may include last four of social security number, address, and telephone number.
3. **Notice to Customers of Account Change-** The Company will notify the customer immediately when the following are created or changes (1) back up or forgotten passwords (2) the address of record (3) adding additional users to account.
4. **Records of Disclosure of CPNI-** The Company shall maintain a record of its own or any affiliates sales and marketing campaigns (if any) that use their customer's CPNI. The Company's Sales and Marketing Manager is responsible for maintaining this record, which shall include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. This record shall be kept for a minimum of one year.

5. **Duty to report violation or departure from CPNI Policies and Procedures Manual-** Each employee, officer, or board member of the Company has an affirmative duty to ensure compliance by the Company of the requirements under federal and state law governing the use of CPNI. Any employee, officer, or board member of the Company who knows of or has reason to believe that a violation of or departure from the policies and procedures set forth in this Manual has occurred or will occur shall immediately notify your immediate Manager, Executive Officers, or CEO, or any member of the Board of Directors if the CEO is the subject of the suspected violation.
6. **Notice to Law Enforcement of Unauthorized Disclosure of CPNI-** The Company must notify law enforcement of a breach of its customer's CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification through a central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation. The Company will not notify customers or disclose the breach to the public until 7 full days have passed after the notification to the USSS and the FBI except as provided in FCC guidelines. The Company will maintain a record of breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach. The record must be retained for 2 years.
7. **Employee annual certification/training-** All employees of the Company shall be given a copy of this Manual. All employees are required annually to review the manual and to certify in writing that he or she understands and will adhere to the policies and procedures in this manual.
8. **Annual Certificate of Compliance-** The Company's Officer of Compliance shall annually sign a CPNI compliance certificate stating that the officer has personal knowledge that the Company has established policies and procedures that are adequate to ensure compliance with the FCC's CPNI rules.



## **Customer Proprietary Network Information (CPNI) Rules and Training**

### **Employee Acknowledgement:**

I understand that if Breda Telephone Corp., Prairie Telephone Co., Inc., BTC, Inc., or Westside Independent Telephone Co. determines that I have violated the CPNI rules, I may be subject to disciplinary action up to and including termination of employment. I understand and agree to comply with the CPNI rules in all respects, and I will contact my Department Manager if I have questions regarding these rules.

I acknowledge that I have received CPNI training and received a copy of the manual on Policies and Procedures Governing Customer Proprietary Network Information ("Manual"). I understand the content of the training and the manual. I understand and agree to comply with all aspects of the training and manual, and I will contact my Department Manager if I have questions regarding the training or the manual.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Employee

#### Training CPNI 2017

1. January 20, 2017 – Staff meeting was held, and we conducted our annual CPNI training. Compliance Officer Stephanie Thomsen handed out the Company CPNI manuals and trained staff with our Company's policies and procedures governing CPNI. Staff was given an acknowledgment form which indicates that they were trained and fully understood CPNI. These forms were signed and turned back into our HR department and are kept on file.
2. All staff completed an online CPNI certification training through Cronin Communication. Upon completion, each staff person received a certificate of completion, a copy of which was turned into our HR department and is kept on file.

## EMPLOYEE LIST - WESTERN IOWA NETWORKS

Attended Staff Meeting on January 20, 2017

SHAWN AHMANN  
BETH BLACKBURN  
JOHN COON  
HOLLY DARVEAU  
TERRY DICKINSON  
DERIK DOUGLAS  
DOUG EHLERS  
BRIAN HAMACHER  
AMY HATTERMAN  
JODI IRLBECK  
DELYNNE KROEGER  
JULIE LAMAACK  
JACOB LANGHOLZ  
MIKE LUDWIG  
DIANE MILLER  
JANE MORLOK  
RICK MORRIS  
CHRIS NIELAND  
BRIAN POTTEBAUM  
SCOTT RIDGWAY  
MISSY SANDER  
KEVIN SKINNER  
BRIAN STEINKAMP  
TAYLOR STEINKAMP  
STEPHANIE THOMSEN  
WES TREADWAY  
BRUCE TYSOR  
STEVE UHLENKAMP  
MORGAN WARNEKA  
LAURA WINE

FULL-TIME ALPHA EMPLOYEE LIST - WESTERN IOWA NETWORKS  
Effective 12/01/2016 - CPNI Training Certificates

1. SHAWN AHMANN
2. BETH BLACKBURN
3. JOHN COON
4. HOLLY DARVEAU
5. CHUCK DEISBECK
6. TERRY DICKINSON
7. DOUG EHLERS
8. BRIAN HAMACHER
9. AMY HATTERMAN
10. JODI IRLBECK
11. DELYNNE KROEGER
12. JULIE LAMAACK
13. JACOB LANGHOLZ
14. MIKE LUDWIG
15. DIANE MILLER
16. JANE MORLOK
17. RICK MORRIS
18. CHRIS NIELAND
19. BRIAN POTTEBAUM
20. SCOTT RIDGWAY
21. MISSY SANDER
22. KEVIN SKINNER
23. BRIAN STEINKAMP
24. TAYLOR STEINKAMP
25. STEPHANIE THOMSEN
26. WES TREADWAY
27. BRUCE TYSOR
28. STEVE UHLENKAMP
29. MORGAN WARNEKA
30. WINE, LAURA

CRONIN

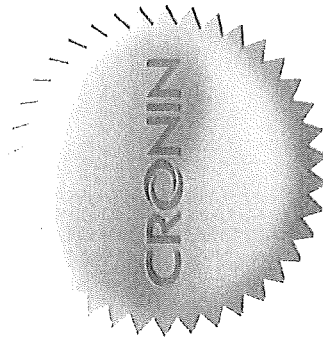
# *Certificate of Completion*

THIS CERTIFIES THAT

**STEPHANIE THOMSEN**

HAS SUCCESSFULLY COMPLETED CPNI TRAINING

12/01/2016



A handwritten signature in black ink, appearing to read "Timothy E. Owens".

TIMOTHY E. OWENS, PRESIDENT

### Notifications to our Customers 2017

1. December 1, 2017 – Opt out notifications were sent to all our customers. We included our 800 number and an email address if customers wanted to contact us to opt out. If we are notified that a customer would like to opt out we will set an alert in our billing system. When CSR opens that customer's account an alert will pop up stating "Do Not Market". Notification insert attached.

## Sample CPNI Opt-Out Notification Bill Message

### CPNI Marketing Opt-Out Notification

It is the responsibility of Breda Telephone Corp. and its affiliate companies doing business as Western Iowa Networks (herein referred to as WIN) under federal law to protect the confidentiality of your Customer Proprietary Network Information (CPNI). CPNI is any information which is not publicly available and includes the type of phone service you receive from WIN, number of lines, the long distance carrier or calling plan you have chosen, amount of usage and calling detail.

We understand the importance you place on your privacy. That is why WIN keeps all customer account information strictly confidential to the fullest extent possible. Only WIN can see or use your CPNI. It is never released to outside marketing companies. You have the right, and we have the duty under federal law to protect the confidentiality of this type of information.

As a customer, you have the right at any time to restrict the use of CPNI for marketing purposes. No action on your part is necessary unless you wish to restrict WIN's use of this information for tailoring our service offerings to better meet your needs. If you choose not to permit WIN to use your CPNI, you may opt-out of receiving such information. Your denial for use of CPNI will remain valid until you tell WIN otherwise. The services you are currently receiving will not be affected if you opt-out, however, restricting CPNI may make you ineligible to receive information from WIN about new products and services, packaged offerings and various promotions.

If you DO NOT want to share your CPNI with WIN, please call us at 888-508-2946, send an email to [cpnidata@westianet.com](mailto:cpnidata@westianet.com), or sign and return this page to our business office at the address below within thirty (30) days.

Western Iowa Networks  
112 East Main St.  
Breda, IA 51436

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Breda Telephone Corp.  
Prairie Telephone Co., Inc.  
Westside Independent Telephone  
BTC, Inc.

d/b/a Western Iowa Networks

CPNI Marketing Opt-Out Notification

It is the responsibility of Breda Telephone Corp. and its affiliate companies doing business as Western Iowa Networks (herein referred to as the Company) under federal law to protect the confidentiality of your Customer Proprietary Network Information (CPNI). CPNI is any information which is not publicly available and includes the type of phone service you receive from the Company, number of lines, amount of usage and calling detail.

As a customer, you have the right at any time to restrict the use of CPNI for marketing purposes. If you choose not to permit us to disclose your CPNI with the Company, you may opt-out of receiving such information. The services you are currently receiving will not be affected if you opt-out, however, restricting CPNI may make you ineligible to receive information from the Company about new products and services, packaged offerings and various promotions.

If you DO NOT want us to share your CPNI with the Company you should sign and return this form to our business office at the address below within thirty (30) days.

Western Iowa Networks  
112 East Main St.  
Breda, IA 51436

Signature: \_\_\_\_\_

Date: \_\_\_\_\_





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### AUTHORIZED ACCOUNT USER FORM

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Name: \_\_\_\_\_ Account Number: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Service(s): \_\_\_\_\_

Authorized Account Users (please include name, phone number and email address, and Include additional sheet(s) if necessary):

_____	_____	_____
_____	_____	_____

---

I give Western Iowa Networks permission to discuss the following information with the above listed account users:

- ☐ Billing inquiries ONLY
- ☐ Telephone inquiries ONLY
- ☐ Digital/Cable TV inquiries ONLY
- ☐ Adding/removing services, features, changing long distance carriers/rate plans
- ☐ Activating new or additional lines
- ☐ Reporting troubles
- ☐ Re-sign contracts for service
- ☐ Disconnect services/account
- ☐ All of the above

I understand by signing below, I am granting all above-listed authorized users access to the account as indicated above:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

---

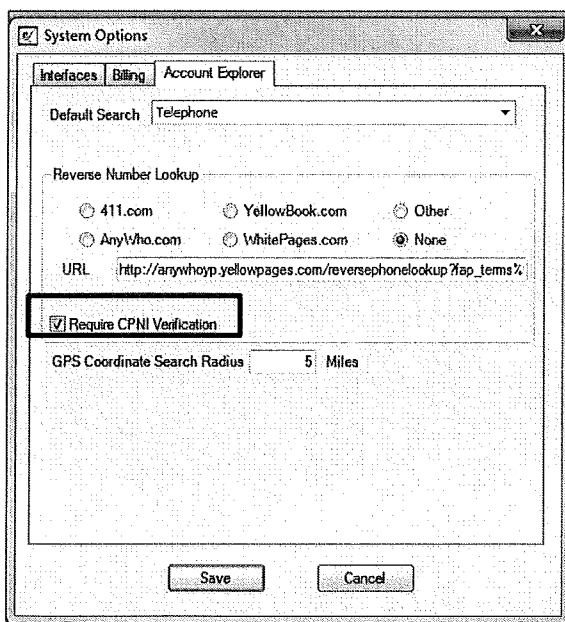
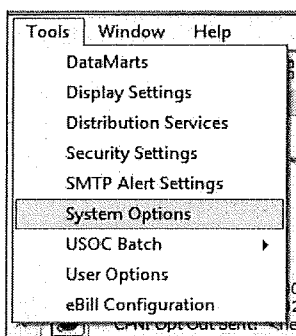
**FOR OFFICE USE ONLY:**

Employee Signature: \_\_\_\_\_ Date received: \_\_\_\_\_ Service Order #: \_\_\_\_\_

# CPNI – Configuration, Splash Screen, Advisory and Opt-Out Notification Letters

## CPNI Configuration

A system configuration setting controls if the verification splash screen will appear in front of CPNI sensitive data. Usage and Invoice screens support verification.

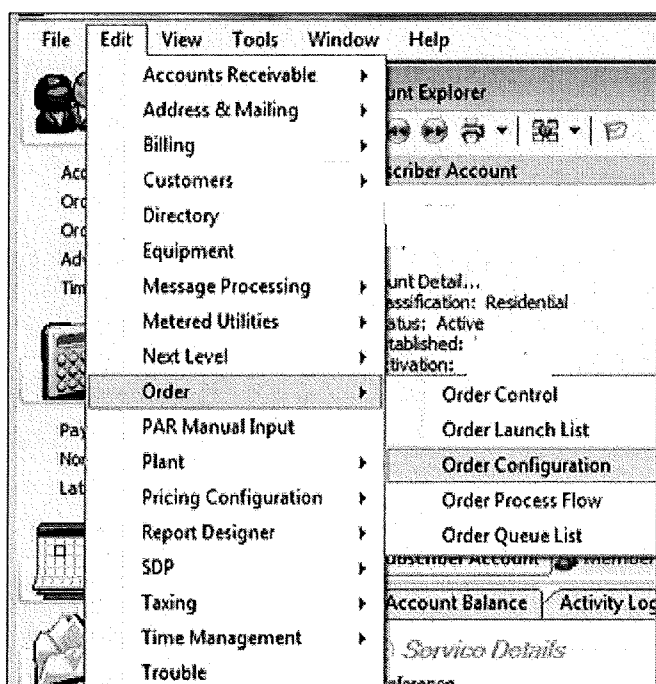


## CPNI Security Questions Configuration

A CPNI question group is defined to prompt/store security information for the customer. This adds the ability to specify one of two new password field types.

- Password-PIN (Numeric Only)
- Password-Uppercase (Exclude AEIOQU01) <- recommended for CPNI

It is recommended that the question prompting for the CPNI password use the second type listed above. Existing clients can change to this type without concern because it will auto generate passwords using the minimum length only; therefore, the user can use the auto generate button to create a new password or continue to type them in as they have in the past. Question groups are configured in the Order Configuration Table on the Question Tab screen.



**Order Configuration**

Save

Order Types Workgroups Queue Layout Questions

Order Question Group Cpni & Promo Questions

Questions

Question

CPNI Password

Security Question

Security Question Answer

Marketing Quesitons

Format Password-Uppercase (Exclude AEIOUQ01)

Required ☐

Type CPNIPAS X

Provision Class Do Not Send

Minimum Length 4

Maximum Length 20

**Order Configuration**

Save

Order Types Workgroups Queue Layout Questions

Order Question Group Cpni & Promo Questions

Questions

Question

CPNI Password

Security Question

Security Question Answer

Marketing Quesitons

Format Password-PIN (Numeric Only)

Required ☐

Type CPNIPAS X

Provision Class Do Not Send

Minimum Length 4

Maximum Length 4

Question	
CPNI Password	
Security Question	
Security Question Answer	
Marketing Questions	
Format	Value List
Required	<input type="checkbox"/>
Type	SECQUES X
Provision Class	Do Not Send
Value List	
From what school did you graduate?	
What is your mothers maiden name?	
What was the name of my first pet?	

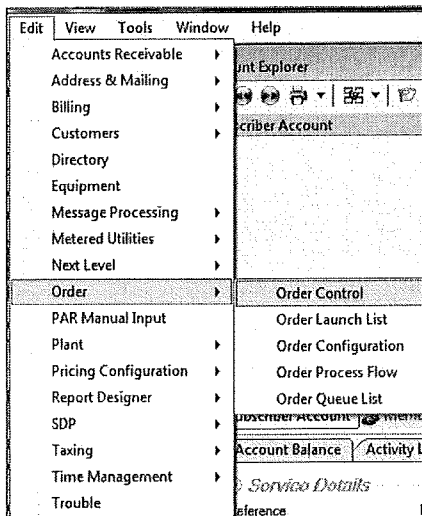
In order for the questions and answers to appear in Account Explorer on the Questions tab, a Type Code has to be entered on the Type line. This code needs to be unique to each value you wish to appear in AX. Note: Once a Type code has been entered and assigned in an order, the Type should never be changed.

Question	Account Balance	Activity Log	Charges	Transactions	Credit Events	Directory	Service Detail	Contact
Type	Date	Question	Response					
Group: Cpmi & Promo Questions								
CPNIPAS	12/16/2015	CPNI Password	C34J					
SECQUES	12/16/2015	Security Question	What was the name of my first pet?					
SECQANS	12/16/2015	Security Question Answer	Smetly					

## CPNI Configuration ~ Identifying CPNI Question Group

By identifying which question group is being used for security questions in the order control screen shown below, two features will be enabled:

- CPNI Verification Screen will include the CPNI security questions (if any have been entered for the account).
- The Storefront application will include CPNI prompts with the account information.



**Order Control**

Control Behavior Membership Account Service Pricing Address Telephone Utility

Account

CPNI question group **Cpni & Promo Questions**

Agent CPNI Verification Question **Marketing Questions** X

☐ Default to first billing arrangement to be billed after 0 days.

☒ Default to 'Requires Prenote' when setting up ACH.

The setting above allows you to remove the Question node from your order flow, thereby eliminating the CPNI screen from showing in the order. CPNI can then be entered on the Dynamic Service Order Screen (eLation Best Practice) so long as users are trained to always review this as part of the order process.

Item	Data
0020172 Stepp, Nathan	
00029740-5	Nathan Stepp
Billing	Nathan Alice Stepp
Account Credit Info	C - Fair
Cpni & Promo Questions	
208 N Main Ave	CU
Facilities	2

**Cpni & Promo Questions**

CPNI Password

Security Question

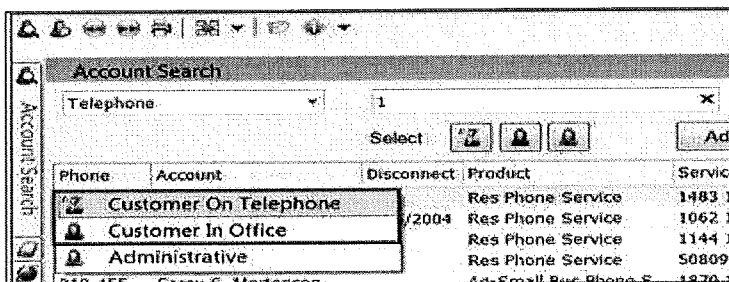
Security Question Answer

## CPNI Verification Splash Screen

Depending on company policy, verification of security information may be required when the user attempts to view an invoice and/or usage information. When the system setting (Require CPNI Verification) shown on page 2 is enabled a splash screen will appear in front of CPNI sensitive information. Once a CSR selects the method used to verify the user is who they say they are, they can click the <Continue> button and the splash screen is removed revealing the information concealed behind it.

If the CPNI verification method is answered on the Usage screen it will be applied to the Invoice Viewer as well. Likewise, selecting a verification method from the Invoice Viewer will remove the Usage splash screen. When an account is loaded for Administrative viewing the splash screen/CPNI verification will not appear. Each time an account is unloaded and reloaded CPNI verification will be required. Again, the CPNI verification screen will only appear if the account is loaded as follows:

- Customer On Telephone
- Customer In Office



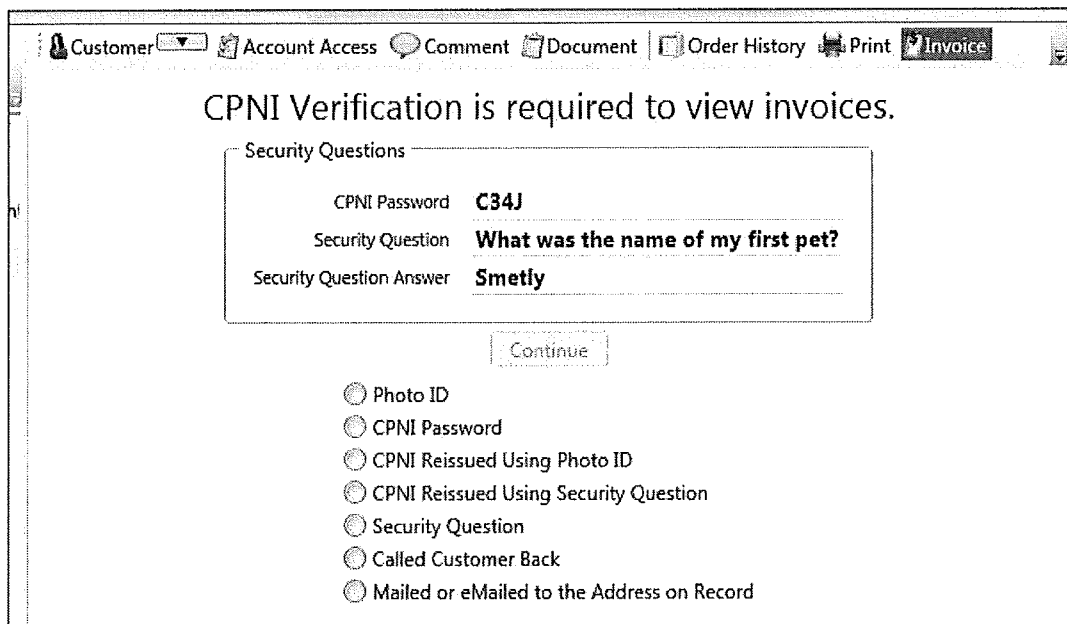
When a verification method is selected (and <Continue> button pressed) and entry is logged in the activity log for it as shown below.

Account Balance	Activity Log	Charges	Transactions	Credit Events	Directory	Service Detail
<div> <div> <div>Date</div> <div>User</div> <div>Activity</div> </div> <div> <div>12/17/2015 8:59...</div> <div>Lacey</div> <div>Account Viewed In Account Explorer (4 Times)</div> </div> <div>Review Account -</div> <div> <div>12/17/2015 8:59...</div> <div>JeanT</div> <div>Account Viewed In Account Explorer (3 Times)</div> </div> <div> <div>12/17/2015 8:58...</div> <div>JeanT</div> <div>CPNI Verification Entered (2 Times)</div> </div> <div> <div>12/17/2015 8:45...</div> <div>Lacey</div> <div>CPNI Verification Entered (2 Times)</div> </div> <div> <div>12/16/2015 3:44...</div> <div>Lacey</div> <div>Account Viewed In Account Explorer (4 Times)</div> </div> <div> <div>12/16/2015 1:45...</div> <div>Lacey</div> <div>CPNI Information Viewed (Customer In Office)</div> </div> <div> <div>12/16/2015 1:45...</div> <div>Lacey</div> <div>Dso (Order: 0112679) for service: 218-857-3530</div> </div> </div>						

Selecting either of the CPNI Reissued methods will also create an entry in the Account Advisory Event Log. If the company elects to send advisory letters to their customers these two actions can be used to trigger them. Again, the following verification methods will write Advisory letter requests:

- CPNI Reissued Using Photo ID
- CPNI Reissued Using Security Question

### Invoice Viewer ~ Store Front



Customer Account Access Comment Document Order History Print Invoice

## CPNI Verification is required to view invoices.

Security Questions

CPNI Password **C34J**

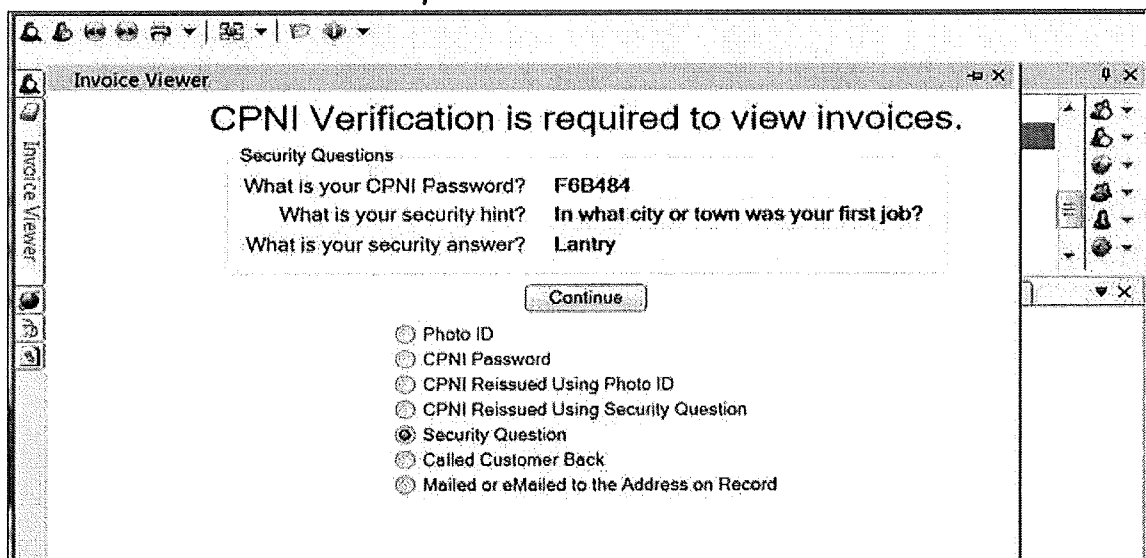
Security Question **What was the name of my first pet?**

Security Question Answer **Smetly**

Continue

☐ Photo ID  
☐ CPNI Password  
☐ CPNI Reissued Using Photo ID  
☐ CPNI Reissued Using Security Question  
☐ Security Question  
☐ Called Customer Back  
☐ Mailed or eMailed to the Address on Record

### Invoice Window ~ Account Explorer



Invoice Viewer

## CPNI Verification is required to view invoices.

Security Questions

What is your CPNI Password? **F6B484**

What is your security hint? **In what city or town was your first job?**

What is your security answer? **Lantry**

Continue

☐ Photo ID  
☐ CPNI Password  
☐ CPNI Reissued Using Photo ID  
☐ CPNI Reissued Using Security Question  
☒ Security Question  
☐ Called Customer Back  
☐ Mailed or eMailed to the Address on Record



**Usage Window ~ Normal View:** Verification prompts are centered.

**Subscriber Account**  
Drayton, ND 58225-0207 \*\*Certified on 3/31/2011

Account Detail...  
Classification: Residential  
Status: Active  
Established: Jul 09, 2007

**Service List**

- Caller ID With Call Waiting
- Unpublished Number Charge
- Wire Maintenance
- Federal Access Charge
- Minnesota Tap Fee
- Tam Charge

**Usage** | Account Balance | Activity Log | Charges | Transactions | Credit Events | Directory | Service Detail

**CPNI Verification is required to view usage.**

Security Questions

What is your CPNI Password? F6B484  
What is your security hint? In what city or town was your first job?  
What is your security answer? Lantry

☐ Photo ID  
☐ CPNI Password  
☐ CPNI Reissued Using Photo ID  
☐ CPNI Reissued Using Security Question  
☒ Security Question  
☐ Called Customer Back  
☐ Mailed or eMailed to the Address on Record

**Usage Window ~ No CPNI Questions:** All security prompts are removed.

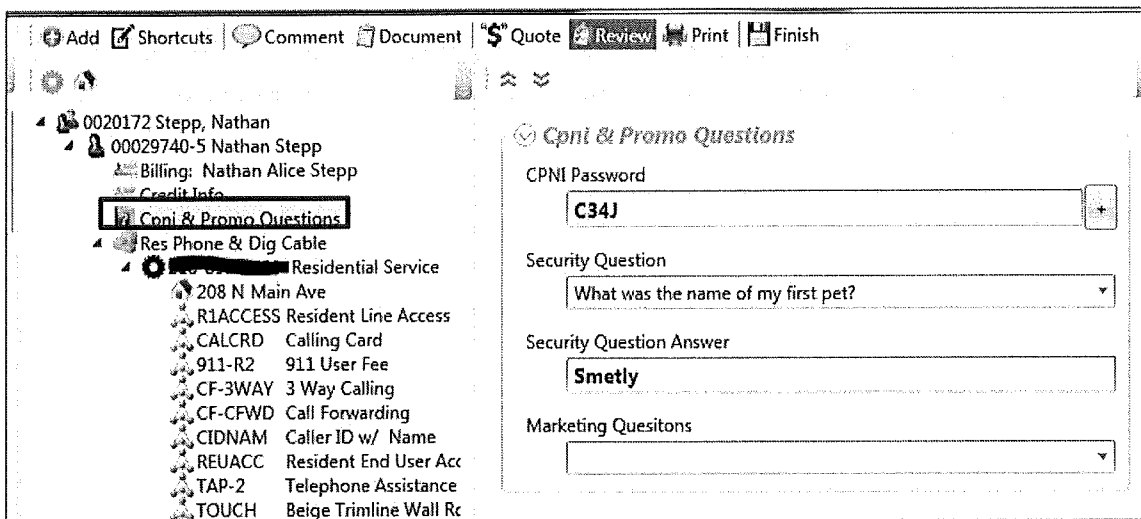
**Usage** | Account Balance | Activity Log | Charges | Transactions | Credit Events | Directory

**CPNI Verification is required to view usage.**

☐ Photo ID  
☐ Called Customer Back  
☐ Mailed or eMailed to the Address on Record

## CPNI Security Data Entry

**Via Store Front Application:** When a CPNI question group has been defined and the order control table entry is set to identify which group contains this security information, store front will include an entry section on the review screen.

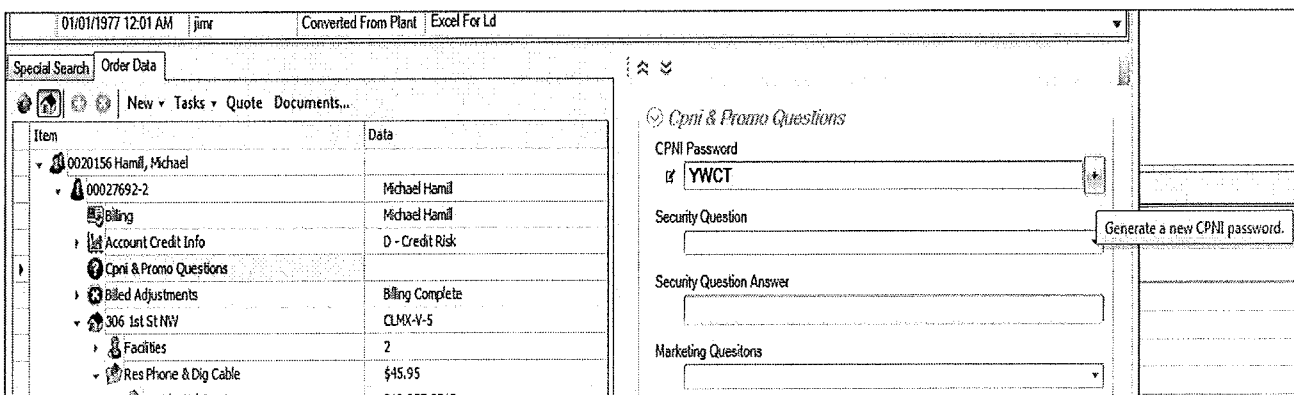


The screenshot shows the 'Review' screen of the Store Front Application. On the left, a tree view lists account details for Nathan Stepp, including 'CPNI & Promo Questions' which is highlighted. On the right, the 'CPNI & Promo Questions' section contains the following fields:

- CPNI Password:** C34J
- Security Question:** What was the name of my first pet?
- Security Question Answer:** Smetly
- Marketing Questions:** (Empty dropdown)

**Via Order Entry Application:** In order entry the CPNI question group is then entered on the Question group line on the DSO or Review screen in an order. Refer to the **CPNI Security Questions Configuration** section above for information on how to set up the CPNI question group (also done via the Order Configuration table).

Note: If the CPNI Password is set to auto generate, clicking the + sign will generate the PIN/PW.



The screenshot shows the 'Review' screen of the Order Entry Application. On the left, a table lists order items, with 'CPNI & Promo Questions' highlighted. On the right, the 'CPNI & Promo Questions' section contains the following fields:

- CPNI Password:** YWCT
- Security Question:** (Empty dropdown)
- Security Question Answer:** (Empty text box)
- Marketing Questions:** (Empty dropdown)

A button labeled 'Generate a new CPNI password.' is located next to the Security Question field.

## Advisory Letters

Advisory letters, emails or text messages can be sent when account profile information is altered.

Both storefront and order entry will create Advisory Event Log entries when specific customer data is modified. These entries can be included in an advanced search in conjunction with letter writer to notify customers when their profile data has changed. The full list of Advisory Events that are logged are as follows:

1. A new billing account was established in your name.
2. The billing address and/or name have been changed for your billing account.
3. Your email address was modified.
4. Your contact telephone number(s) has been changed.
5. Your SMS Text # number has been changed.
6. Your security access question and/or CPNI password was modified.
7. Your CPNI password was reissued using a security question.
8. Your CPNI password was reissued using photo identification
9. A new line of service has been added to your account.
10. Your new eBill account has been created.


Advisory Events 1 through 6 and 9 & 10 are automatically logged when the user updates an order. Events 7 and 8 are logged when the CSR selects the corresponding verification method from the splash screen.

**NOTE:** An important detail here is that when order entry and storefront add Advisory Events the account data (name, address & email) records are the old values (if changed). CPNI requires that letters and email be sent to the old address to prevent fraud.

If the advisory message is set to be sent as a text or an email- it will send to the primary contact on the account. If those fields aren't populated, the advisory letter will sit as a pending message and be generated through letter writer batch.

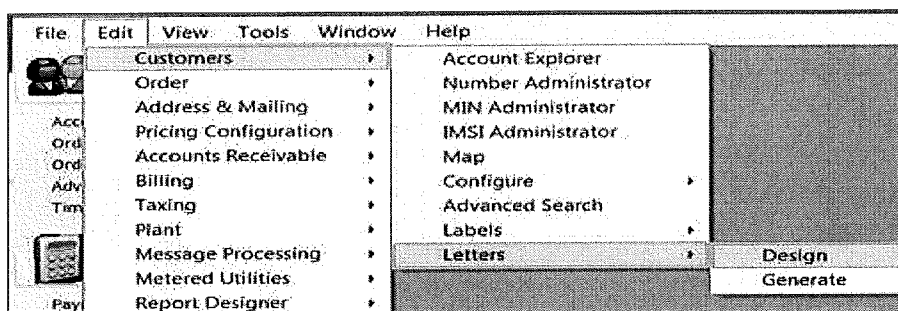
**Creating Advisory Letters ~ Advanced Search:** The Advisory Event Log node is what reports the advisory reasons. When this node is used it will include all Advisory Events that have not been processed. Simply include the filter 'Is Pending-yes' and 'Send Class-send' as shown and the advance search will return accounts that need to potentially have letters sent.

CPNI Advisory Letters																			
<b>Columns</b> Account Account Number Advisory Reason Advisory Reason Text Advisory Date Advisory Send Class Advisory Pending	Owner <Public Search>  Search Created on 3/30/2012 Results last generated on 6/4/2012  <table border="1"> <thead> <tr> <th>Criteria</th> <th>Columns</th> <th>Test</th> </tr> </thead> <tbody> <tr> <td>(JoinType)</td> <td></td> <td>MustHave</td> </tr> <tr> <td>Advisory Date</td> <td></td> <td></td> </tr> <tr> <td>Advisory Reasons</td> <td></td> <td></td> </tr> <tr> <td>Is Pending</td> <td></td> <td>Yes</td> </tr> <tr> <td>Send Class</td> <td></td> <td>Send</td> </tr> </tbody> </table>	Criteria	Columns	Test	(JoinType)		MustHave	Advisory Date			Advisory Reasons			Is Pending		Yes	Send Class		Send
Criteria	Columns	Test																	
(JoinType)		MustHave																	
Advisory Date																			
Advisory Reasons																			
Is Pending		Yes																	
Send Class		Send																	



**Advisory Event Log**  
 Send Class:  
     Send  
 Is Pending Advisory Message

**Creating Advisory Letters ~ Letter Designer:** While a complete description of letter design is outside the scope of this document, the example below demonstrates a new section (Advisory Messages) that can be added to the letter when the event message detail is to be included.



Once you have inserted a blank page, right click on the blank page, select Document Properties, and set the Letter class to Advisory Letter. Select the advanced search you created from the drop-down.

**Design Properties** ✖

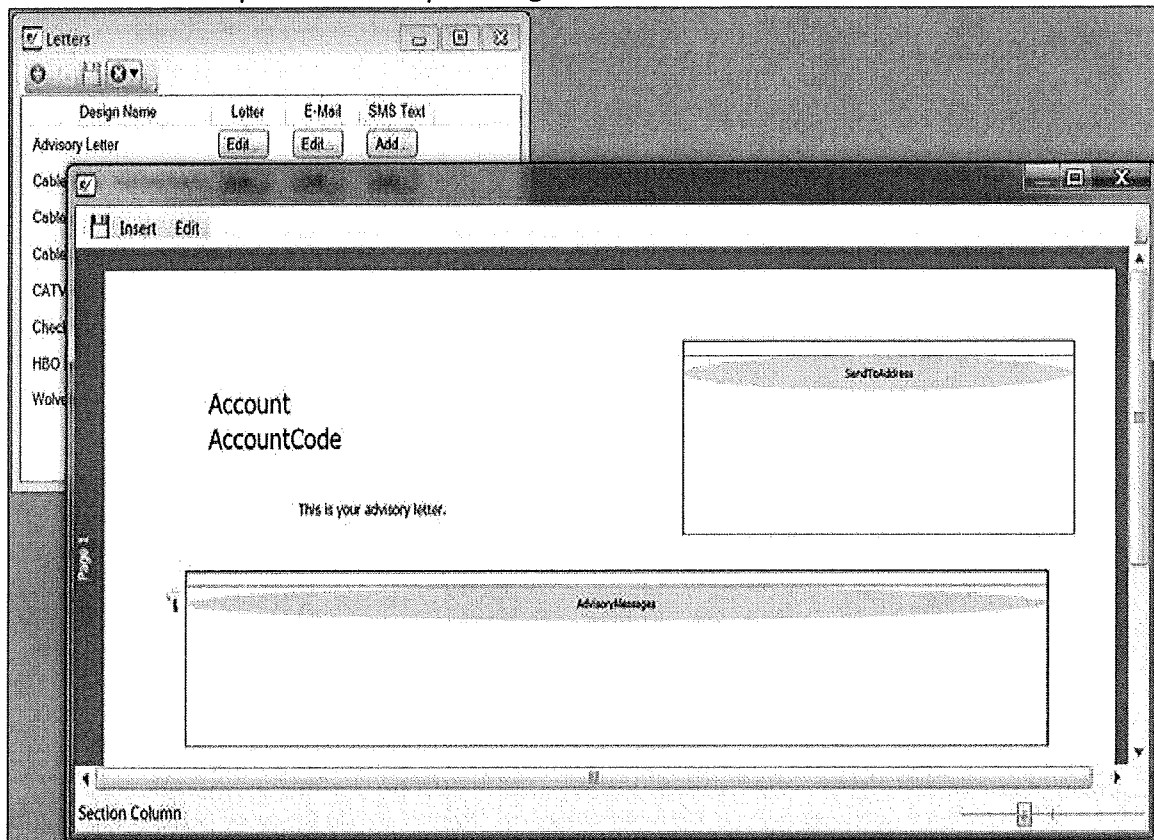
Duplex Printing: Simplex

Letter Class: Advisory Letter

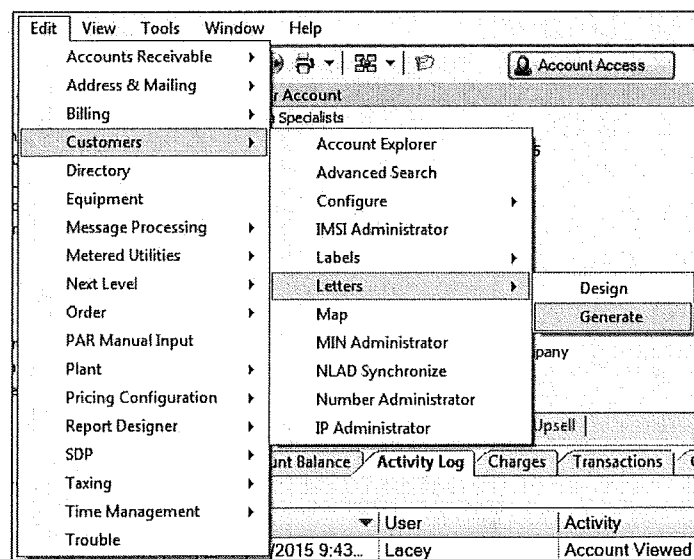
Letters Per Page: 1

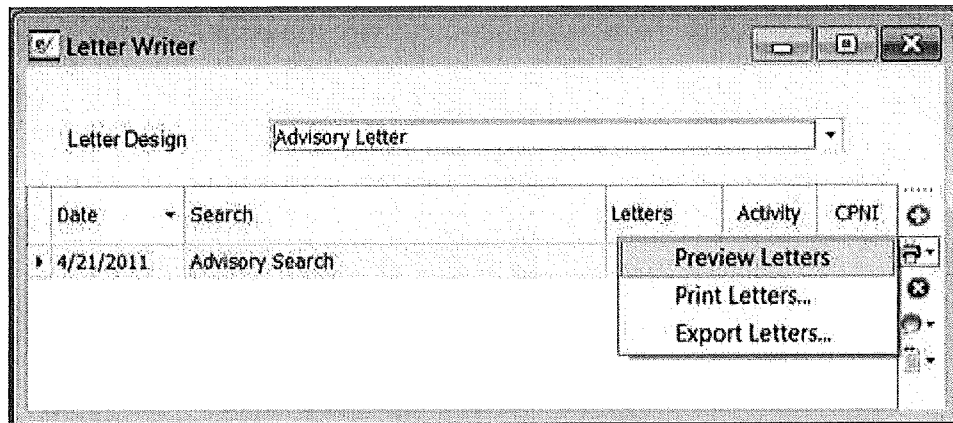
Advanced Search: CPNI Advisory Letters

Insert the section panel 'Advisory Messages':



**Creating Advisory Letters ~ Letter Generation:** Below is an example letter. When duplicate events are found (same data changed multiple times) the messages will be combined in the Advisory Message section and the oldest date will be used.





An example of an advisory message:

**The following change(s) have been made to your account:**

Dec 17, 2015 The billing address and/or name have been changed for your billing account.

**Creating Advisory Letters ~ Advisory Message Configuration:** Specific advisory messages can be altered or suppressed entirely using the user interface shown below. This screen can be invoked from the OSS main menu toolbar Customers->Configure->Advisory Messages.

A new billing account was established in your name.	
Print as	A new billing account was established in your name.
Action	Send as Advisory ▼
The billing address and/or name have been changed for your billing account.	
Print as	The billing address and/or name have been changed for your billing account.
Action	Send as Advisory ▼
Your eMail address was modified.	
Print as	Your eMail address has been changed.
Action	Send as both text and Email ▼
Your contact telephone number(s) has been changed.	
Print as	Your contact telephone number(s) has been changed.
Action	Send as Advisory ▼

An activity log entry for your letter can be created, as well:

Letter Design <span>CPNI Advisory Letter</span>				
Date	Search	Letters	Activity Log	CPNI
6/4/2012	CPNI Advisory Letters	1	<input type="checkbox"/>	<input type="checkbox"/>
6/4/2012	CPNI Advisory Letters	350	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5/25/2012	CPNI Advisory Letters	1	<input type="checkbox"/>	<input type="checkbox"/>
4/25/2012	CPNI Advisory Letters		<input type="checkbox"/>	<input type="checkbox"/>

Create Activity Log

Account Balance	Activity Log	Charges	Transactions	Credit Events	Directory	Service Detail	Contacts	Prepay												
<table border="1"> <thead> <tr> <th>Date</th> <th>User</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>12/17/2015 9:43...</td> <td>Lacey</td> <td>Account Viewed In Account Explorer (3 Times)</td> </tr> <tr> <td colspan="3">Review Account -</td> </tr> <tr> <td>12/17/2015 9:43...</td> <td>Lacey</td> <td>Letter: CPNI Advisory Letter</td> </tr> </tbody> </table>									Date	User	Activity	12/17/2015 9:43...	Lacey	Account Viewed In Account Explorer (3 Times)	Review Account -			12/17/2015 9:43...	Lacey	Letter: CPNI Advisory Letter
Date	User	Activity																		
12/17/2015 9:43...	Lacey	Account Viewed In Account Explorer (3 Times)																		
Review Account -																				
12/17/2015 9:43...	Lacey	Letter: CPNI Advisory Letter																		

## Reporting on Advisory Events

Reporting can also be done by using the Advisory Event Log node to report/extract advisory event log information.

Advanced Search

Tools: Check History, Member Balance, Member Comment, Member Data, Retirement History

Account: Account Comment, Account Data, Activity Log, Adjustment, Adjustment Counts, **Advisory Event Log**, Automatic Payment, Balance Groups, Comment Counts, Contact Data, Credit Event Count, Credit Events, Deposits, Documents, Documents Counts, Invoice History, Invoice Ready, Marketing Indicat...

Search:  [New] [Delete] [Rename]

Columns: ☐ Advisory Event Log

Options: Portrait, Landscape, Password, Owner: BrianM, Search Created on 4/23/2011

Criteria: Columns, Test, Serialize, SQL

(JoinType) MustHave

Advisory Date

Advisory Reasons

Is Pending

Send Close

Select the ac

☐ A new billing account was establish...  
☐ The billing address and/or name ha...  
☐ Your contact telephone number(s) h...  
☐ Your CPNI password was reissued u...  
☐ Your CPNI password was reissued u...  
☐ Your eMail address was modified.

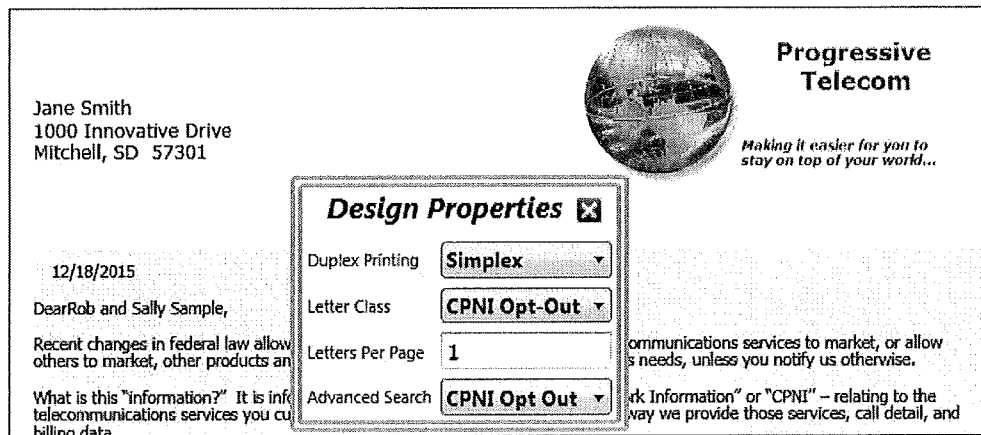
Select All Unselect All

Results Save Cancel

## Creating CPNI Opt Out Letters

### Letter Designer

In letter designer set your letter class to CPNI Opt Out, and select the advanced search you created for this letter type.



**Progressive Telecom**  
Making it easier for you to stay on top of your world...

Jane Smith  
1000 Innovative Drive  
Mitchell, SD 57301

12/18/2015

Dear Rob and Sally Sample,

Recent changes in federal law allow others to market, other products and services to market, or allow your needs, unless you notify us otherwise.

What is this "information?" It is information relating to the telecommunications services you currently use. This information, or "CPNI" – relating to the way we provide those services, call detail, and other information.

**Design Properties**

Duplex Printing: Simplex

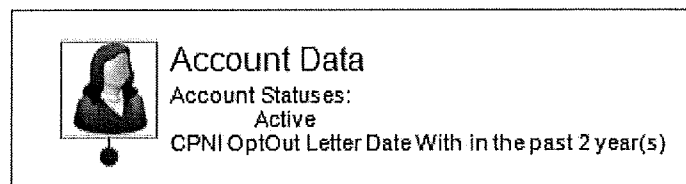
Letter Class: CPNI Opt-Out

Letters Per Page: 1

Advanced Search: CPNI Opt Out

### Advanced Search

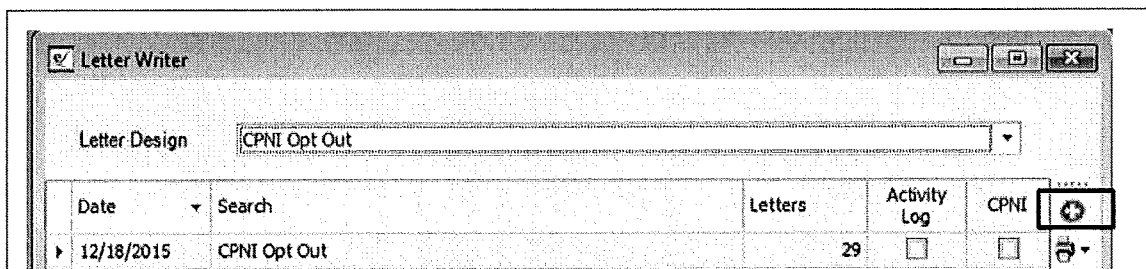
The criteria your advanced search will need will vary for your company. More than likely you will need to include the Account Data node – change **CPNI OptOut Letter Data** to within the last 1 or 2 years.



**Account Data**  
Account Statuses:  
Active  
CPNI OptOut Letter Date With in the past 2 year(s)


### Letter Writer- Generate Letters

Find your letter design in the drop down and hit the green plus to create a new batch. From there you can preview using the print icon drop down.



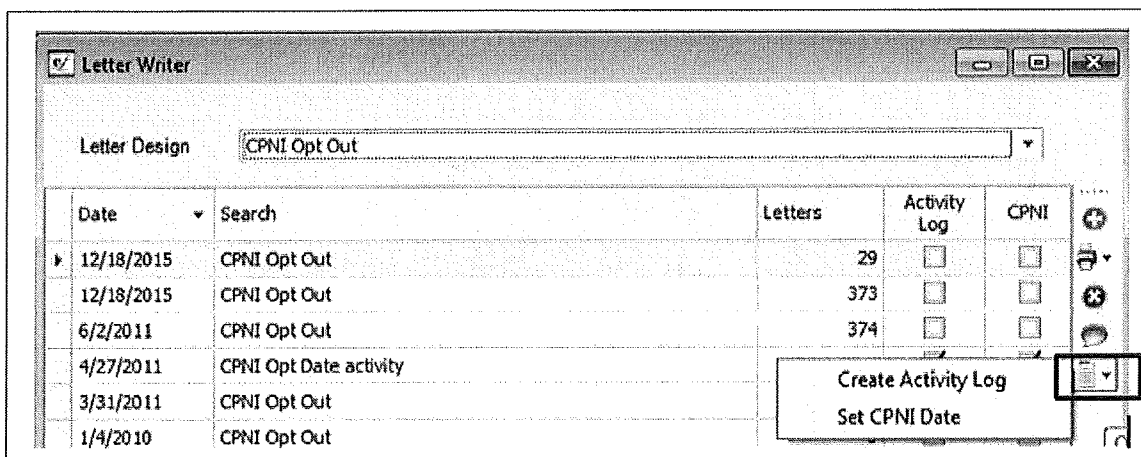
**Letter Writer**

Letter Design: CPNI Opt Out

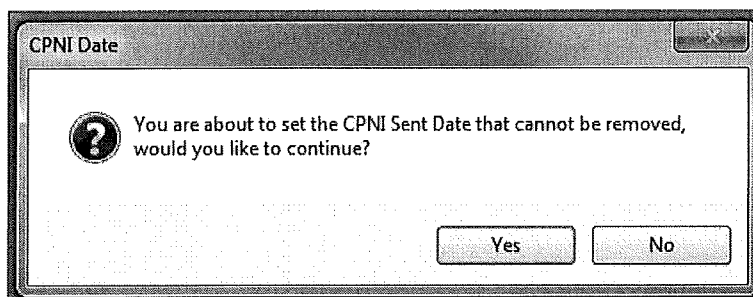
Date	Search	Letters	Activity Log	CPNI
12/18/2015	CPNI Opt Out	29	<input type="checkbox"/>	<input type="checkbox"/> 



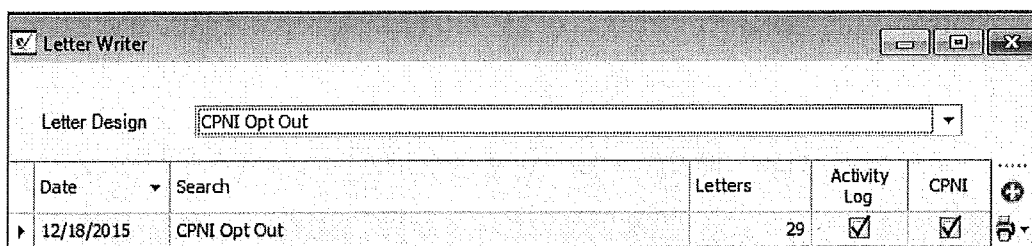
Once you have either printed or exported the PDF file to your print vendor are ready to move on you will want to create the Activity log, and also Set the CPNI Date. By clicking the notebook piece of paper you can find both of these options.



You will be prompted with this message- click Yes to set the date or create the Activity log:



The Opt Out letters are posted to the activity log and the CPNI dates are set



View of information in the Subscriber Account Window and Activity Log:

Subscriber Account

Account Detail...

Classification: Residential  
Status: Active  
Established: Jan 01, 1977  
Activation: Jan 01, 1977  
CPNI Opt Out Sent: Dec 18, 2015 (Not Confirmed)

Billing...

Arrangement: Progressive Comm Telephone Company

Subscriber Account
Member View
Upsell

Account Balance
Activity Log
Charges
Transactions
Credit Ev

Date	User	Activity
12/18/2015 1:41...	Lacey	Account Viewed in Acco
Review Account -		
12/18/2015 1:37...	Lacey	Letter: CPNI Opt Out